

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PETER M. GALLIGAN,)	
Plaintiff,)	
)	
)	
v.)	Case No. 17 C 6310
)	
)	Hon. Joan H. Lefkow
ROSS UNIVERSITY SCHOOL OF)	
MEDICINE SCHOOL OF VETERINARY)	
MEDICINE (ST. KITTS) LIMITED; and)	
DOES 1 THROUGH 50,)	
Defendants.)	

**MOTION OF MICHAEL W. FORD TO
WITHDRAW AS LOCAL COUNSEL FOR PLAINTIFF**

Pursuant to local rule 83.17 of the United States District Court for the Northern District of Illinois, the undersigned local counsel for plaintiff Peter M. Galligan hereby respectfully requests leave from this Court to withdraw his appearance as local counsel of record in this case for Peter M. Galligan, and in support thereof states as follows:

1. Irreconcilable differences have arisen between counsel and plaintiff Peter M. Galligan.
2. Counsel and Mr. Galligan have endeavored to resolve these differences, but without success.
3. These differences are of such a nature that counsel no longer believes he can provide effective representation to Mr. Galligan, and as a result should withdraw from the case.
4. Counsel requests that Mr. Galligan be granted a minimum of 21 days from the date of counsel's withdrawal to find replacement local counsel who is a member of this

Court's Trial Bar. In the alternative, Mr. Emil T. (Tom) Bayko, lead counsel for Mr. Galligan, is a member of this Court's General Bar and an experienced and highly capable trial attorney who has tried numerous matters in the State and Federal Courts of Texas, Illinois and other jurisdictions. Pursuant to Local Rule 83.12 Mr. Bayko can most probably qualify for a waiver of the Trial Bar requirement should Mr. Galligan so request it. Mr. Galligan would thus be relieved from the effort and expense of finding, retaining and bringing up to speed a Chicago attorney who is a member of the Trial Bar.

WHEREFORE, the undersigned respectfully requests the Court to grant his motion to withdraw his appearance in this case as local counsel of record for Peter M. Galligan, by signing the attached proposed order

Dated this 30th day of July, 2020.

Respectfully Submitted,

/s/Michael W. Ford

Michael W. Ford, Esq.

IL Bar # 0846139

LAW OFFICE OF MICHAEL W. FORD (*local counsel*)

4 Timberwood Lane

Riverwoods, IL 60015

Tel. 847.948.7884

Email: mfordski@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that I have caused a true and correct copy of the foregoing Motion to Withdraw and Proposed Order allowing the same by filing a copy with the Court's CM/ECF system, which will send notification to the following, on this 30th day of July, 2020:

Andrew Randall Cockroft
acockroft@seyfarth.com
Brian Stolzenbach
bstolzenbach@seyfarth.com
SEYFARTH SHAW LLP
233 S. Wacker Drive, Suite 8000
Chicago, IL 60606
Tel. 312/460-5000
Fax 312/460-7000

Mr. Peter M. Galligan
821 E. Dove Loop Road, #2325
Grapevine, TX 76051
petermgalligan@gmail.com

Emil T. Bayko
IL Bar # 0141356
tbayko@pfalawfirm.com
Prebeg, Faucett & Abbott, PLLC
8441 Gulf Freeway, Suite 307
Houston, TX 77017
Tel. 832/742-9260 Fax 832/742-9261

I also hereby certify that I have caused a true and correct copy of the foregoing Motion to Withdraw to be delivered to the plaintiff Peter M. Galligan at his last known address, 821 E. Dove Loop Road, #2325, Grapevine, TX 76051 by 1st class U.S. Mail, postage prepaid, on this 30th day of July, 2020

/s/Michael W. Ford

Michael W. Ford, Esq.